

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AUBREY DRAKE GRAHAM,

Plaintiff,

No. 1:25-cv-399-JAV

v.

UMG RECORDINGS, INC.,

Defendant.

**DECLARATION OF SIR LUCIAN GRAINGE, CBE**

Pursuant to 28 U.S.C. § 1746, I, Lucian Grainge, declare as follows:

1. I am the Chairman and CEO of Universal Music Group N.V., which is the indirect parent corporation of Defendant UMG Recordings, Inc. (“UMG”).

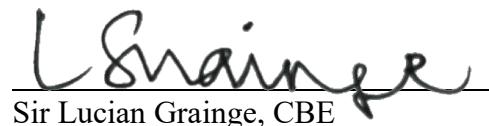
2. Plaintiff Aubrey Drake Graham (“Drake”) claims that I was behind a scheme to “devalue” his brand through the release and promotion of the Kendrick Lamar recording “Not Like Us”—an allegation that makes no sense due to the fact that the company that I run, Universal Music Group N.V., has invested hundreds of millions of dollars in Drake, including longstanding and critical financial support for his recording career, the purchase and ownership of the bulk of his recording catalog, and the purchase of his music publishing rights.

3. It also makes no sense whatsoever as I run a publicly-traded, multi-billion dollar, multi-national corporation whose operations in over sixty countries covering nearly 200 markets ultimately report up to me. Our business encompasses over 100 record labels (as well as a multinational music publishing division, global merchandise and direct to consumer businesses, the worldwide Virgin Music label services, short and long form audiovisual production, and a

variety of other businesses), each with its own CEO/President and its own management structure. Collectively these businesses issue tens of thousands of releases and product each month. My focus is on developing and implementing the global strategy that will shape UMG for generations to come. In light of this responsibility, the proposition that I am in the weeds as to the release and promotion of any particular sound recording, from the thousands of UMG releases throughout the world, is farcical.

4. Given my role, I am accustomed (and unfortunately largely resigned) to personal attacks, and I further recognize that a frequent strategy of UMG's litigation opponents is to attempt to waste my and UMG's time and resources with discovery of the sort that Drake is seeking here—either in an attempt to gain media attention or in an effort to force some kind of commercial renegotiation or financial concessions. But given Drake's motion, I would like to make it quite clear that I had never heard the recording "Not Like Us," nor ever saw the corresponding cover art or music video, until after they were released by Interscope Records. Whilst, as part of my role, I certainly have financial oversight of and responsibility for UMG's global businesses, the proposition that I was involved in, much less responsible for, reviewing and approving the content of "Not Like Us," its cover art or music video, or for determining or directing the promotion of those materials, is groundless and indeed ridiculous.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 14, 2025 in Monterey, California.

  
\_\_\_\_\_  
Sir Lucian Grainge, CBE